

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 20554

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In the Matter of)
)
 Joint Petition for Rulemaking) RM No. 8380
 on Cable Television Wiring)

COMMENTS

OF

THE SOUTHERN NEW ENGLAND TELEPHONE COMPANY

The Southern New England Telephone Company (SNET) submits its comments in support of the Joint Petition for Rulemaking, filed July 27, 1993, by the United States Telephone Association, the Media Access Project, and the Citizens for a Sound Economy Foundation (Joint Petition).¹

SNET supports policies that encourage customers to choose freely among services offered by competing providers, and urges the Federal Communications Commission (Commission) to adopt such policies. Unrestricted access by alternative providers to cable home wiring will be a major step toward achieving choice for consumers, and a competitive cable market. Rules for telephone inside wiring provide an excellent model for cable home wiring.

¹ In the Matter of Joint Petition for Rulemaking on Cable Television Wiring, RM No. 8380, DA 93-1343, released November 15, 1993.

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1. Access and Interconnection to Cable Home Wiring will Foster Competition.

Rules that allow access and interconnection to cable home wiring, regardless of the original provider of that wiring, will foster competition and enhance the availability of video dial tone.² Such access and interconnection will give customers the choice of receiving services from competing broadband service providers whether or not they have terminated cable service from the original wiring provider.

A decision to allow greater customer control over cable home wiring is clearly in the public interest. The current bottleneck control by cable companies is preventing fair and reasonable access to cable home wiring for all cable subscribers, and accordingly limits customer choice and competitive entry.³ Removal of this hurdle will be a major step toward the goal of creating a favorable competitive environment.

2. Cable Home Wiring and Telephone Inside Wiring Should be Subject to Similar Rules.

SNET agrees with the Joint Petition that the Commission's pro-competitive goals for telephone inside wire can be realized for cable home inside wiring.⁴ Rules for both in-place and new cable home wiring can be readily adopted using as a model the current rules for telephone inside wiring. From a consumer's viewpoint, there is little difference between telephone inside wiring and cable home wiring. Consumers have experienced and accepted the Commission's deregulation of telephone inside wiring. This experience demonstrates a form of deregulation that can work, and work well.

² See Telephone Company / Cable Television Cross-Ownership Rules, Second Report and Order 7 FCC Rcd 5781 (1992).

³ Joint Petition at page 5.

⁴ Joint Petition at page 7.

As in the telephone wiring model, rules need to include a uniform definition of the point of demarcation for both telephone inside wire and cable home wiring. These rules should insure that cable home wiring within the customer's premises -- as defined by the demarcation point -- is accessible to competing and complementary service providers. This model can ensure that consumers enjoy additional services while not incurring additional cost and inconvenience of more than one broadband entry to their home.


Just as the Commission encouraged competition through customer control over telephone inside wiring, the Commission can promote effective competition through customer control over cable home wiring. Such an approach will put the use of cable home wiring on the same competitive footing as telephone inside wiring, and will promote customer choice. Allowing the current situation to continue, on the other hand, would permit barriers to competition to remain in place. It is also wasteful and not good public policy to force the redundant installation of home wiring for consumers who want access to competing and complementary services.

3. Summary

For all of these reasons SNET supports the Joint Petition and urges the Commission to adopt rules encouraging competitive access to cable home wiring. The development of competition in cable home wiring is clearly in the public interest. Rules for cable home wiring that are similar to those for telephone inside wiring will promote such competition. The principles and standards for telephone inside wiring have worked well and serve as an excellent model for the cable industry. Consumers will then be able to benefit from alternative services connected on a non-discriminatory basis to cable wiring at an appropriate demarcation point.

Respectfully submitted,

THE SOUTHERN NEW ENGLAND TELEPHONE COMPANY

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December 21, 1993

CERTIFICATE OF SERVICE

I, Melanie Raycroft, hereby certify that a copy of the foregoing Comments of The Southern New England Telephone Company has been served this 21st day of December 1993, by United States first class mail, postage prepaid, upon the parties listed on the attached Service List.


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